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NOV 30 2007 IN THE UNITED STATES DISTRICT COURT
 MICHAEL W. DOBBINS FOR THE NORTHERN DISTRICT OF ILLINOIS
 CLERK, U.S. DISTRICT COURT EASTERN DIVISION

TAMARAH BOWEN,

Plaintiff,

vs.

KCA FINANCIAL SERVICES, INC.

Defendant.

07CV 6732

JUDGE GRADY

MAGISTRATE JUDGE MASON

COMPLAINT

NOW COMES the Plaintiff, TAMARAH BOWEN, by and through her attorneys,
 LARRY P. SMITH & ASSOCIATES, LTD., complaining against the Defendant, KCA
 FINANCIAL SERVICES, INC., and alleging as follows:

PRELIMINARY STATEMENT

1. This is an action for actual and statutory damages for violations of the Fair
 Debt Collection Practices Act (hereafter the "FDCPA"), 15 U.S.C. §1692, et seq.

JURISDICTION AND VENUE

2. Jurisdiction arises under the Fair Debt Collection Practices Act, 15 U.S.C.
 §1692, et seq.

PARTIES

3. Plaintiff, TAMARAH BOWEN ("Plaintiff"), is an individual who was at
 all relevant times residing in the City of St. Charles, State of Illinois.

4. At all relevant times herein, Defendant, KCA FINANCIAL SERVICES,
 INC., ("Defendant") acted as a debt collector within the meaning of 15 U.S.C. §1692a(6)
 in that it held itself out to be a company collecting a debt allegedly owed to "Valley
 Ambulatory Surgery Center."

5. Defendant is a corporation that has its principal place of business and its offices located in the Geneva, Illinois.

COUNT I -
VIOLATIONS OF THE FDCPA

6. Plaintiff incorporates the foregoing paragraphs as though the same were set forth at length herein.

7. Defendant began collection of the aforementioned debt in part by placing the debt on Plaintiff's credit report.

8. In September of 2007, Plaintiff submitted a written dispute to one or more credit reporting agencies regarding the account, or trade-line, reported by Defendant.

9. Upon information and belief, within five (5) days of Plaintiff notifying said credit reporting agencies, said agencies notified Defendant of the Plaintiff's dispute and the nature of the dispute.

10. However, Defendant disseminated credit report information regarding the account and as in collections and failed to report that the account is currently disputed by Plaintiff.

11. Defendant violated the Fair Debt Collection Practices Act, 15 U.S.C. §1692 in one or more of the following ways:

a. Communicated or threatened to communicate to any person credit information which is known or which should be known to be false, including the failure to communicate that a disputed debt is disputed in violation of 15 U.S.C. §1692c(8); and

b. Was otherwise deceptive and failed to comply with the Fair Debt Collection Practices Act.


12. As a result of Defendant's violations as aforesaid, Plaintiffs suffered and continues to suffer personal humiliation, embarrassment, mental anguish and emotional distress.

WHEREFORE, Plaintiff, TAMARAH BOWEN, by and through her attorneys, respectfully pray for judgment as follows:

- a. All actual compensatory damages suffered;
- b. Statutory damages of \$1,000.00 for each Plaintiff;
- c. Plaintiff's attorneys' fees and costs;
- d. Any other relief deemed appropriate by this Honorable Court.

*****PLAINTIFF REQUESTS A TRIAL BY JURY*****

Respectfully Submitted,
TAMARAH BOWEN

By: 
Larry P. Smith
Attorney for Plaintiff

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